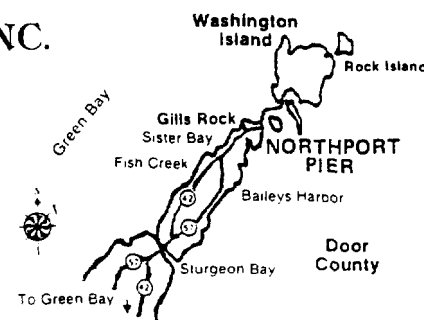
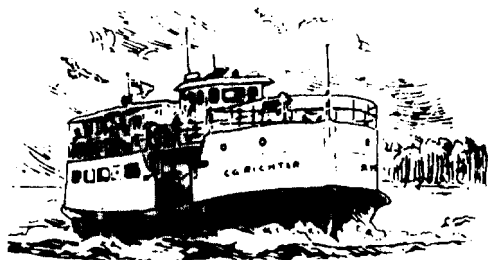


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Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

June 30, 1995

RE: CI Docket No. 95-54, NPRM, Great Lakes Agreement.

Washington Island Ferry Line, Inc., operates five passenger/vehicle ferries in Lake Michigan, and we undergo an FCC vessel inspection annually for each, as per the Great Lakes Agreement.

I would propose this NPRM be expanded to accommodate the following:

1. Privatize FCC vessel inspections

The FCC inspector can only tell us what is wrong. The FCC licensed radio technician can tell us what is wrong, and he can also fix it.

Having an FCC inspector and an FCC licensed radio technician present for inspections each year is **costly, duplicative, and unnecessary**. I urge the FCC to streamline the process, permitting the owner and licensed FCC technician to set the inspection time and location, at the rate normally charged by the radio service center for field work.

2. Reduce the Great Lakes inspection to once each five years, rather than annually.

* Place Great Lakes frequency of inspection on par with that of coastal vessels. SOLAS does not require an annual radio inspection.

* CFR 47 (80 to end) 80.931, places the responsibility for a properly operating radio upon the master. This, plus owner's responsibility, currently covers the vessel and equipment 364 days of the year, without FCC onsite presence.

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* It has been, and so remains, in the best interest of vessel master and owner to keep radio equipment in proper operating condition for safety and for the routine radio traffic between vessels and to home office. This continues to be the best incentive for properly operating equipment.

* Radios of this era are far superior in dependability than those of twenty or thirty years ago, and most multi-vessel companies carry spares for the event of radio malfunction.

(We hold up the example of radar units, equally complex, and perhaps more important at times than marine radios to the vessel master, as examples of private industry manufacturers offering ever-more reliable radar units, and servicing them in a satisfactory manner...all in the vessel master's best interest for the safety of his vessel. No FCC involvement has been necessary, other than in manufacturing standards and servicing by an FCC licensed technician.)

3) Reduce paperwork, eliminate unnecessary administrative tasks

A simplification of adherence to FCC regulations, both for vessel owner and the government, can be realized with a longer interval between inspections, and by elimination of filing requirements, separate check payments and forms for each vessel, and the coordination efforts now required to enable the FCC inspector, vessel and radio tech to converge at a designated time.

We would expect, without presence of an FCC inspector, FCC filing fees would be eliminated.

4) Further study of the situation is not necessary.

There are over twenty years of case history following the adoption of the Great Lakes Agreement, plenty of time to indicate the present FCC/industry relationship can be improved upon. During this time the FCC budget has shrunk, some functions, such as test proctoring, have already been given to private industry.

I would stress that to be fair with the small passenger vessel segment, as well as the number of marine radio sales and service centers, that the FCC not hang it's hat on classification societies. At this juncture, most small passenger vessels - which I believe are the majority of vessels currently under the FCC Great Lakes "wing", have no experience with nor interest in classification society activities. There is no reason to replace the FCC with another group which merely takes over functions for the FCC.

If there is a notion that the only realistic way to privatize FCC functions is to turn them over to classification societies, this is symptomatic of the **lack of communication** the FCC has had with small vessel owners and operators. We hear of proposed rulemaking more or less by accident. To my knowledge we have not been consulted as a group as to how the present system works for us, while we contributed heavily through current user fees to the FCC business book.

According to a recent White House memorandum, it is not only befitting a regulatory agency like the FCC to seek out opinions of those it serves, but it is a **mandate from the President**.

5) Simplify the Marine Radio Operator Permit process

Not a direct response to a particular NPRM point of discussion but an area worth reassessing is the means of licensing for Marine Radio Operator Permits. Currently, an applicant must file with the FCC, pay a fee, and do basically the same thing with a private, FCC approved radio outlet to take the test. If the test is passed, the applicant receives a card for his wallet, good for five years.

A solution to duplication and unnecessary filing, fees, etc., is to **turn this process over entirely to the private sector**. Award the successful applicant with a **lifetime license**, similar to other licenses issued by the FCC.

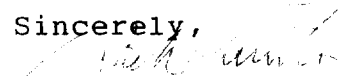
6) Follow up inspections, random inspections are unnecessary

We would suppose the FCC, as required by law, can always drop in for a visit, for a random check. However, this duplication and expense could best be avoided by a check-in process with the approved FCC-licensed radio sales and service centers that will be doing the actual work.

We look forward to a real improvement in the cumbersome, costly, time consuming process that now accompanies FCC vessel inspections and licensing. We encourage the FCC to look boldly at improvements which save money and simplify the process for both government and private sector.

As a small passenger vessel master and company manager, I would hope my voice is heard, along with deep draft vessel representatives, when assessment of current regulations is in order.

Sincerely,


Dick Purinton

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Washington Island, Wisconsin 54246